



MEMO ENDORSED

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Via ECF

The Honorable Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

RE: Milano v. Provident Life and Casualty Insurance Company, et al.
Civil Action No.: 1:19-cv-03357 (VEC)

Dear Judge Caproni:

This firm represents Defendants, Provident Life and Casualty Insurance Company (“Provident Life”) and The Paul Revere Insurance Company (“Paul Revere”) (collectively “Defendants”) in the above referenced matter. Defendants, with the consent of our adversary, respectfully request that Defendants be allowed to file the administrative record (bates stamped PRL-CL-NL12129744-000001-000817) in this ERISA matter under seal. Defendants request that the administrative record be filed under seal even considering the presumption of access discussed in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119–20 (2d Cir. 2006), as the administrative record contains extensive medical information regarding Plaintiff. In accordance with Your Honors “Individual Practices in Civil Cases”, the administrative record is being filed under seal on ECF today as well.

Respectfully submitted,

WHITE AND WILLIAMS LLP

Zaara Bajwa Nazir

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Enclosures

cc: Aegis Frumento, Esq., *via ECF*

Application GRANTED. The administrative record may be filed under seal.

SO ORDERED.

Valerie Caproni

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

5/8/2020